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April 5, 1985

Ms. Judi Swartz
Superfund Branch M/S 525
U. S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

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Executive Summary - Feasibility Study for Subsurface Cleanup -
Western Processing, Kent, Washington

Dear Ms. Swartz:

Metro staff has reviewed this study and offers the following comments:

Water Quality

Metro supports both the dredging of Mill Creek sediments and control of contaminated ground water inflow to protect water quality in the Duwamish River. The Harper-Owes report, Water Quality Assessment of the Duwamish Estuary, 1983, completed for Metro as part of the Duwamish Clean Water Plan, identified zinc inputs from the Black River as a major load (23 percent) to the Duwamish River. Since Mill Creek is the major water source for the Black River, any measures taken to eliminate heavy metals, specifically zinc, from this system would be beneficial in reducing total loading to the Duwamish River and would be in support of recommendations in the Duwamish Clean Water Plan. We feel that the two measures mentioned above will accomplish the needed control.

It should be pointed out, however, that additional stream restoration measures recommended for Mill Creek to improve fish passage and rearing habitat may be minimally effective over the long term. If local jurisdictions do not implement additional mitigation upstream of the Western Processing site to control sedimentation and dissolved oxygen depletion due to other storm water inputs and flow conditions, this restored stream reach will quickly revert back to a slow moving sediment laden area with low dissolved oxygen levels. These latter upstream problems are unrelated to the Western Processing Superfund problems (references: (1) Bortz, Kent Planning Dept., 1981; (2) Yake, Washington State Dept. of Ecology, 1984).

Wastewater Facilities


Any new or additional discharge from the Western Processing site into Metro's sanitary sewer system will require an Industrial

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Waste Discharge Permit from Metro. The current limitation for discharge into Metro's sanitary sewer system is 140,000 gallons/day. Any discharge in excess of this amount would require discharge into a different local collector sewer, possibly on the south side of the property. In addition, Metro places limitations on the quality of discharges to the sanitary system. The proponent should be advised to contact Mr. Bruce Burrow of Metro's Industrial Waste Unit (447-6836) regarding this matter.

Thank you for the opportunity to comment.

Very truly yours,


Ruth A. Hertz, Acting Manager
Environmental Planning Division

RAH:gbw